

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Ajay Bahl,

Plaintiff,

Case No. 1:14-cv-04020 (DC)(LGD)

-against-

NEW YORK COLLEGE OF OSTEOPATHIC
MEDICINE OF NEW YORK INSTITUTE OF
TECHNOLOGY (“NYCOM-NYIT”
or “NYCOM”),

**DEFENDANT NYIT’S PROPOSED
VERDICT FORM**

Defendant.

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Defendant New York Institute of Technology¹ (“NYIT”) respectfully requests that the Court consider the following proposed verdict form.

Dated: June 4, 2024
New York, New York

Respectfully submitted,

CLIFTON BUDD & DeMARIA, LLP
Attorneys for Defendant NYIT

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By: _____

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¹ NYIT is improperly named herein as New York College of Osteopathic Medicine of NYIT. New York College of Osteopathic Medicine, now known as NYIT College of Osteopathic Medicine, is a college of NYIT and not a separate entity.

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Defendant.

----- X

Please answer the following questions in order:

1. Did Plaintiff prove by a preponderance of the evidence that he has a disability under Section 504 of the Rehabilitation Act?

YES _____ NO _____

Proceed to the next question.

2. Did Plaintiff prove by a preponderance of the evidence that he has a disability under the New York State Human Rights Law?

YES _____ NO _____

If the answer to both Questions 1 and 2 is “NO,” then please disregard all further questions, sign the verdict form on the last page and inform the Court that you have reached a verdict. If the answer to either Questions 1 or 2 is “YES,” then please proceed to the next question.

3. Did Plaintiff prove by a preponderance of the evidence that Defendant violated Section 504 of the Rehabilitation Act by failing to provide him with a reasonable accommodation?

YES _____ NO _____

4. Did Plaintiff prove by a preponderance of the evidence that Defendant violated the New York State Human Rights Law by failing to provide him with a reasonable accommodation?

YES _____ NO _____

If the answer to Questions 3 and 4 is “NO”, then please disregard all further questions, sign the verdict form on the last page and inform the Court that you have reached a verdict. If the answer to either Questions 3 or 4 is “YES,” then please proceed to the next question.

5. What amount of compensatory damages, if any, did Plaintiff prove by the preponderance of the evidence?

\$ _____

You have completed all questions. After the jury has reached unanimous agreement on all the questions and completed the form, each juror must sign below:

_____	_____
_____	_____
_____	_____
_____	_____

Dated: _____

